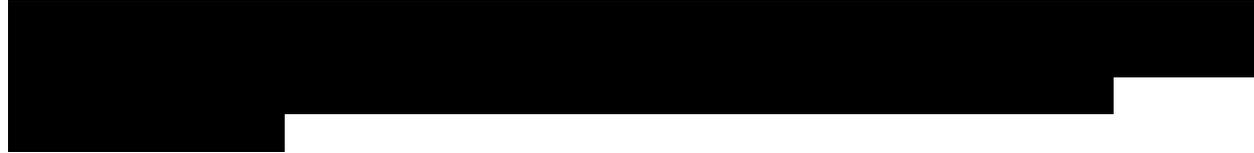


INTERNAL REVENUE SERVICE

Number: **INFO 2000-0151**

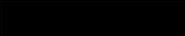
Release Date: 9/30/2000



CC:DOM:P&SI:1-COR-111343-00

June 29, 2000  
UILC 1362.00-00



We are responding to correspondence, submitted on your behalf by   requesting relief in order to establish December 7, 1999, as the effective date for your S corporation election. Based on the information submitted, it appears that your corporation qualifies for automatic relief pursuant to Revenue Procedure 98-55.

Typically, relief for a late S corporation situation is considered via the private letter ruling process, the fee for which runs either \$500 or \$5,000, depending on gross income. However, no fees apply when a taxpayer is eligible for automatic relief under Rev. Proc. 98-55. We have alerted the Service Center about the facts of your case, which should result in an acceptance letter to your regular business address within the next sixty calendar days.

If you have any questions after the sixty days have lapsed, please feel free to call us at the telephone number provided above. Please keep this letter with your tax records and please provide a photocopy of it to your authorized representative. We hope that the above information proves helpful.

Sincerely yours,

**/s/Dianna K. Miosi**

DIANNA K. MIOSI  
Chief, Branch 1  
Office of the Assistant Chief Counsel  
(Passthroughs and Special Industries)